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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

JOHN DOE I, et al. on behalf of themselves and all  
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

**This document applies to: All Actions**

Case No. 3:23-cv-02431-VC  
Consolidated with: 3:23-cv-02343-VC

**CLASS ACTION**

**JOINT CASE MANAGEMENT  
STATEMENT**

Judge: Hon. Vince Chhabria  
Date: July 12, 2024, 10:00 a.m.  
Location: Courtroom 4, 17th Floor

Plaintiffs and Defendant Google LLC (collectively, “the Parties”) in the above-captioned action, by and through their respective counsel of record, hereby submit the following Joint Case Management Statement pursuant to the Court’s Notice Scheduling Further Case Management Conference. ECF No. 150.

**I. STATUS OF PROCEEDINGS**

On March 14, 2024, the Court heard argument on Google’s Motion to Dismiss Plaintiffs’ First Amended Consolidated Class Action Complaint, and scheduled a Further Case Management Conference for May 24, 2024, noting that the conference may need to be delayed in order to provide time for the Court to rule on the Motion to Dismiss in advance of the conference. ECF Nos. 119, 120; Mar. 14, 2024 Tr. at 74:15-19.

On May 17, 2024 and June 14, 2024, the Parties filed Joint Case Management Statements explaining that the Parties had previously conducted a Rule 26(f) conference, but had not yet submitted a Joint Case Management Statement as contemplated by Civil Local Rule 16-9 and the Standing Order for all Judges of the Northern District of California. Given that an order on Google’s Motion to Dismiss was pending, the Parties jointly requested that their Joint Rule 26(f) Report and proposed case schedule be submitted in advance of the first case management conference after the Court rules on Google’s Motion to Dismiss, further requesting that such conference be set for a date approximately three weeks after such a ruling. ECF Nos. 143, 149.

On May 20, 2024, the Court reset the May 24, 2024 Further Case Management Conference for June 21, 2024. ECF No. 144.

On May 31, 2024, the Court requested supplemental briefing from Plaintiffs concerning certain subjects at issue in Google’s Motion to Dismiss, which Plaintiffs submitted on June 7, 2024. ECF Nos. 145, 146.

On June 17, 2024, the Court reset the June 21, 2024 Further Case Management Conference for July 12, 2024. ECF No. 150.

On June 19, 2024, the Court invited a response to Plaintiffs’ supplemental briefing from Google, which Google submitted on June 25, 2024. ECF Nos. 151, 152.

## **II. DISCOVERY**

Discovery has been stayed pending an order on Google's Motion to Dismiss. ECF No. 119. Judge van Keulen entered a Stipulated Protective Order on May 7, 2024. ECF No. 142. Judge van Keulen entered a Stipulated Order re: Discovery of Electronically Stored Information and Hard Copy Documents on June 12, 2024. ECF No. 148.

## **III. FURTHER PROCEEDINGS**

In light of the impact that the Court's anticipated ruling on Google's Motion to Dismiss may have on the Parties' negotiations concerning discovery and case schedule, the Parties propose that their Joint Rule 26(f) Report be submitted in advance of the first Case Management Conference scheduled after the Court rules on Google's Motion to Dismiss, and respectfully request that said conference be scheduled at the convenience of the Court after the Court's ruling on the Motion to Dismiss.

The Parties look forward to discussing the above and any other matters that may be of interest to the Court at the upcoming Further Case Management Conference set for July 12, 2024.

Dated: July 5, 2024

**LOWEY DANNENBERG, P.C.**

/s/ Christian Levis

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Dated: July 5, 2024

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*/s/ Benedict Hur*

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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: July 5, 2024

/s/ *Melissa Gardner*